

Jennifer L. Braster  
Nevada Bar No. 9982  
Benjamin B. Gordon  
Nevada Bar No. 15552  
NAYLOR & BRASTER  
1050 Indigo Drive, Suite 200  
Las Vegas, NV 89145  
(T) (702) 420-7000  
(F) (702) 420-7001  
jbraster@nblawnv.com  
bgordon@nblawnv.com

Alexius Miller  
*Admitted Pro Hac Vice*  
JONES & SPROSS, PLLC  
1605 Lakecliff Hills Lane, Suite 100  
Austin, TX 78732  
(T) (346) 387-4723  
alexius.miller@jonesspross.com

*Attorneys for Plaintiff Marcus Turner*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MARCUS TURNER, an individual  
Plaintiff,

vs.

HARVARD MEDTECH OF NEVADA, LLC,  
a Nevada limited liability company;  
KULDARSHAN S. PADDA, an individual,  
Defendants.

Case No. 2:22-cv-01264-JDM-BNW

**JOINT STIPULATION TO PERMIT  
PLAINTIFF TIME TO FILE AN  
OPPOSITION [ECF NO. 49] AND  
EXTEND TIME TO FILE PROPOSED  
AMENDED DISCOVERY PLAN AND  
SCHEDULING ORDER**

**[First Request - Opposition]  
[Second Request – Discovery Plan]**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and the Court's Local Rule of Civil Practice 7-2, Plaintiff and Defendants stipulate and agree to permit Plaintiff additional time, or until April 21, 2023, to file his response to Defendant's Motion to Dismiss Count 2 of Plaintiff's Second Amended Complaint. *See* ECF No. 49. The parties also agree that Defendants shall have until May 12, 2023 to file a reply. This is Plaintiff's first request for an extension of time for the purpose set forth herein.

1 Plaintiff and Defendants further stipulate and agree to extend the time to file the proposed  
2 discovery plan and scheduling order until April 24, 2023. *See* ECF No. 44. This is the second  
3 request for an extension of time regarding the discovery plan.

4 Plaintiff respectfully requests the Court approve this stipulation and in support of this  
5 request relies upon the following facts: Plaintiff's opposition to Defendants' Motion to Dismiss  
6 is due April 7, 2023, and the proposed discovery plan is due April 10, 2023. Alexius Miller, lead  
7 counsel for Plaintiff, has not been able to complete these items due to a family medical emergency.  
8 The parties have communicated regarding this matter and agree that good cause supports this  
9 request for a two-week extension of time for both the opposition and discovery plan. Should the  
10 Court approve this Stipulation, the additional time requested will permit counsel for Plaintiff  
11 sufficient time to complete and file an opposition and the parties to submit a discovery plan.

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 In light of the foregoing, and based upon good cause, the parties respectfully request that  
2 the Court approve this Stipulation.

3 Dated this 6<sup>th</sup> day of April 2023.

4 NAYLOR & BRASTER

PAUL PADDA LAW, PLLC

6 By: /s/ Jennifer L. Braster  
7 Jennifer L. Braster  
8 Nevada Bar No. 9982  
9 Benjamin B. Gordon  
10 Nevada Bar No. 15552  
11 1050 Indigo Drive, Suite 200  
12 Las Vegas, NV 89145


By: /s/ Paul S. Padda  
Paul S. Padda  
Nevada Bar No. 10417  
4560 S. Decatur Blvd., Suite 300  
Las Vegas, NV 89103

*Attorneys for Defendants Harvard Medtech of  
Nevada, LLC and Kuldarshan S. Padda*

Alexius Miller  
Admitted Pro Hac Vice  
JONES & SPROSS, PLLC  
1605 Lakecliff Hills Lane, Suite 100  
Austin, TX 78732  
(T) (346) 387-4723  
alexius.miller@jonesspross.com

*Attorneys for Plaintiff Marcus Turner*

16 **IT IS SO ORDERED:**

17   
18 UNITED STATES DISTRICT JUDGE

19 **DATED:** April 7, 2023